

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE SEPTEMBER 11 LITIGATION

21 MC 101 (AKH)

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WORLD TRADE CENTER PROPERTIES LLC, et al.,

08 CIV 3722 (AKH)

Plaintiffs,

-against-

AMERICAN AIRLINES, INC., et al.,

NOTICE OF MOTION

Defendants.

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PLEASE TAKE NOTICE that upon the Declaration of Jeffrey J. Ellis dated June 29, 2012, and the Exhibits annexed thereto, as well as the Memorandum of Law and United's Statement of Undisputed Facts Pursuant to Rule 56.1 submitted herewith, and the prior pleadings and proceedings, Defendants United Continental Holdings, Inc. (f/k/a UAL Corporation) and United Airlines, Inc. ("United") move this Court seeking summary judgment dismissing all claims of the World Trade Center Properties Plaintiffs ("WTCP Plaintiffs") relating to Building 7 of the World Trade Center ("7 WTC") against United.

PLEASE TAKE FURTHER NOTICE that United's motion is supplemental to the Aviation Defendants' motion for summary judgment dismissing the claims related to 7 WTC on N. Y. C.P.L.R. § 4545 grounds. Pursuant to this Court's briefing schedule with respect to that motion, Plaintiff's opposition papers are to be filed by August 17, 2012, United's reply papers are due on August 31, 2012. and oral argument is to be heard before the Honorable Alvin K. Hellerstein at 2:30pm on September 11, 2012.

Dated: New York, New York
June 29, 2012

QUIRK AND BAKALOR, P.C.

By: 

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INC., (f/k/a UAL CORPORATION)